

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

RICHARD FORD, et al.,)	
)	
Plaintiffs,)	
)	Case No. 1:08cv1153 JCC/JFA
v.)	
)	
JERRY W. TORREZ, et al.,)	
)	
Defendants.)	
_____)	

**MOTION TO STRIKE DEFENDANT'S MOTION FOR CIVIL CONTEMPT AND
DEFENDANT'S PROTECTIVE ORDER; ALTERNATIVELY, NON-PARTY'S MOTION
TO QUASH DEFENDANT'S SUBPOENA**

Non-party, Thomas Schiller, (hereinafter "Mr. Schiller"), by and through undersigned counsel do hereby respectfully request that this Court enter an order quashing the subpoena pursuant to Rule 45(b)(1) of the Federal Rules of Civil Procedure and Local Rule 45(F) for the Eastern District of Virginia; Alternatively, Mr. Schiller respectfully requests that this Court quash the Defendant's subpoena for because the subpoena for deposition is unduly burdensome pursuant to Rule 43(c)(1) of the Federal Rules of Civil Procedure. Accordingly, Mr. Schiller respectfully requests that the Defendant's motions for civil contempt and protective order be dismissed.

Respectfully Submitted,

/s/ Joshua E. Bushman

Joshua E. Bushman
VSB Number: 74729
Attorney for Thomas Schiller
Joshua E. Bushman, Esquire,
PLLC
2800 Shirlington Road,
Suite 503
Arlington, Virginia 22206
Tel: 703-524-0700
Fax: 703-845-9720
Josh.bushman@bushmanlawgroup.com

I hereby certify that I have served the attached documents on the following party on this date, the 4 of September, 2009, via electronic filing on ECF, electronic mail, and first-class mail postage pre-paid.

Christine S. Ramapuram, Esq.
Counsel for Defendants Jerry W. Torrez and Torres
Advanced Enterprise Soplutions, LLC
1233 20th Street, N.W., 8th floor
Washington, D.C. 20036

James K. Lay, Esq.
Attorney for Rick Ford and Fedsys, Inc.
Lay Moore & Poretz, PLLC
303 N. Washington Street
Alexandria, Virginia 22314

/s/ Joshua E. Bushman

Joshua E. Bushman
VSB Number: 74729
Attorney for Thomas Schiller
Joshua E. Bushman, Esquire,
PLLC

2800 Shirlington Road,
Suite 503
Arlington, Virginia 22206
Tel: 703-524-0700
Fax: 703-845-9720
[Josh.bushman@bushmanlawgroup.](mailto:Josh.bushman@bushmanlawgroup.com)
[com](mailto:Josh.bushman@bushmanlawgroup.com)